being unpatentable over Coelho, Englefield, and in further view of Goodman. Claims 8 and 12-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coelho, Englefield, and in further view of Collier.

For the following reasons, applicants respectfully submit that the rejected claims of the present application are not rendered obvious over Coelho, Englefield, Goodman, and Collier because the cited and applied references, either alone or in combination, fail to teach or suggest instructing each server represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon. Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application are allowable over the cited references, a brief description of the present invention and the cited references is presented.

1. Summary of the Present Invention

The present application is generally related to a system and method for controlling a number of computing devices, such as servers, from a central control computer by manipulating a common graphical user interface ("GUI"). More particularly, the GUI generates a set of graphical icons representative of a group of computing devices within a network that will be managed and a set of graphical action icons representative of computing device control parameters, or actions, that are to be executed by selected computing devices. A user of the GUI may select a computing device icon and/or an action icon and thereby implement the actions represented by the selected action icon on each of the computing devices represented by the selected computing device icons.

In one example of the present invention, a user may select several server icons (representing a group of servers) and an action icon that represents control parameters relating to the collection of performance monitoring data for the selected servers. Upon selection of the

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action icons for selected servers, those actions are automatically executed on each of the selected servers. In particular, the server control computer, upon receipt of a selection of servers and actions, generates and issues a template to each of the selected servers containing information to initiate the selected actions. Thus, the present invention provides the ability to control several networked computing devices, located at geographically distinct sites, by instructing each server to execute instructions from a common location.

2. U.S. Patent No. 6,128,016, to Coelho

Coelho is purportedly directed toward a graphical user interface ("GUI") for monitoring and displaying information pertaining to the components and subcomponents of a single server. *See* Coelho, Col. 13, lines 11-17; Col. 16, lines 17-21; Figure 3. The component categories and associated subcomponent categories are displayed as icons within a hierarchical navigation model. Col. 8, lines 34-42; Figure 3, Levels 1 and 2. A user may traverse through the component and subcomponent areas of a single server by selecting the displayed category icons. Col. 8, lines 35-39; Figure 3. Coelho teaches that selecting an icon triggers the navigation model to display either a next level of the selected component category or a dialog screen containing information. Col. 8, lines 40-42; Figure 3.

As presented in Coelho, the user may determine the status in addition to setting threshold values for items to be managed within the server. Abstract. The user monitors and updates the server with the latest values by clicking on a control button on a display screen. Col. 10, lines 63-65; Col. 11, lines 19-21; Col. 11, lines 31-33. Once an update value is added in, the workstation connects to a server system through a communications network. The workstation framework facility converts requests for reading and writing data from the application into the appropriate management application protocols within the TCP/IP protocol suite for communicating with the server. Col. 3, lines 51-58. Figures 4b, 4c, and 4d.



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Coelho fails to teach or suggest displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device. Moreover, Coelho fails to teach or suggest instructing each networked computing device represented by a selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

3. U.S. Patent No. 5,896,491 to Englefield

Englefield is purportedly directed toward a system and method for processing data represented on a display device. Col. 1, lines 6-9. Englefield teaches an icon display for representing each processing operation available to the user. Col. 2, lines 25-27. The user selects one of the processing operation icons. Col. 5, line 67-Col. 6, line 2. The user then moves a pointer to apply the processing operations to the data item on the graphical interface. Col. 7, line 21-Col. 8, line 8.

Nevertheless, Englefield fails to teach or suggest graphical computing device icons which are representative of one or more computing devices in a network. Englefield also fails to teach or suggest obtaining a selection of graphical computing device icons. Further, Englefield fails to teach or suggest instructing a server represented by the selected graphical computing device icons to execute the instructions represented by a selected graphical action icon.

B. The Claims Distinguished

1. 35 U.S.C. § 103(a) Rejections

a. Independent Claims 1, 12, and 32

For purposes of this discussion, Claims 1, 12, and 32 will be discussed together because the limitations discussed herein are similar for each claim. Claim 1 reads as follows:

> 1. A method of providing a computing device control interface for centrally controlling a plurality of networked computing devices, the method comprising:



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displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by a computing device;

displaying a set of graphical computing device icons wherein each graphical computing device icon is representative of one or more networked computing devices;

obtaining a selection of a graphical action icon;

obtaining a selection of a graphical computing device icon; and

instructing each networked computing device represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon.

Similarly, Claim 12 reads as follows:

12. In a computer system having a display and at least one graphical user interface selection device, a method of providing a server control interface for centrally controlling a plurality of computing devices, the method comprising:

obtaining an identification of a group of actions to be executed by a plurality of networked computing devices;

displaying the group of actions as an action icon on the display;

obtaining an identification of a group of networked computing devices to be controlled;

displaying the group of networked computing devices as a computing device icon on the display;

obtaining a selection of the action icon by the selection device; and

instructing each networked computing device represented by the computing device icon to execute the groups of actions represented by the action icon upon a selection of the computing device icon with the user interface device.

Claim 32 reads as follows:



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32. A method of providing a server control interface for centrally controlling a plurality of networked servers, the method comprising:

displaying a set of graphical action icons for selection by a user, wherein each action icon is representative of one or more actions to be executed by one or more servers, and wherein at least one graphical action icon in the set of graphical action icons includes an action to implement a collection template for capacity planning;

displaying a set of graphical server icons wherein each graphical server icon is representative of one or more networked servers;

obtaining a selection of a graphical action icon;

obtaining a selection of a graphical server icon; and

instructing each networked server represented by the selected graphical server icon to execute the instructions represented by the selected graphical action icon.

The Office Action asserts that Coelho in combination with Englefield teaches each of the elements of Claims 1, 12, and 32. Office Action, p. 3. Applicants respectfully disagree. In contrast to the Claims of the present application, Coelho is directed toward a graphical user interface ("GUI") for monitoring and displaying information pertaining to the components and subcomponents of a server. *See* Coelho, Col. 13, lines 11-17; Col. 16, lines 17-21; Figure 3. Coelho teaches that the user may update the threshold values that are used to manage the server. Col. 10, lines 63-65. After entering in updating values, the workstation connects to the server. A workstation application converts requests for reading and writing into protocols for communicating with the server. Col. 3, lines 51-58; Col. 11, lines 19-21; Col. 11, lines 31-33; Figures 4b, 4c, and 4d.

Englefield is directed toward a system and method for processing data represented on a display device. Col. 1, lines 6-9. Englefield teaches an icon display means for representing each processing operation available to the user as an icon on the display device. Col. 2, lines 25-27.



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The user selects one of the processing operation icons. Col. 5, line 67-Col. 6, line 2. The user then moves a pointer to apply the processing operation to the data item on the graphical interface. Col. 7, line 21-Col. 8, line 8.

Applicants submit that Coelho in combination with Englefield does not teach or suggest instructing each server represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon as recited in Claims 1, 12, and 32. As taught in Coelho, threshold values for a server are updated through a GUI interface. Col. 10, lines 63-65. The data values are either read or written from the server through a protocol:

> The workstation 10 connects to a plurality of server systems 1 through N through a communications network 20. As described herein, workstation 10 framework facility 10-4 during the execution of the S-view manager application 10-6 converts requests for reading and writing data from the application 10-6 into the appropriate management application protocols within the TCP/IP protocol suite for communicating with each of the server systems 1-N. Col. 3, lines 51-58; Figures 4b, 4c, and 4d.

Because requests for reading and writing data are converted into protocols, Coelho fails to teach or suggest sending instructions to the server for execution. As taught in Englefield, the user selects a processing operation and applies the processing operation to data items directly on the display device. Col. 1, lines 6-9; Col. 2, lines 25-27; Col. 5, line 67-Col. 6, line 2; Col. 7, line 21-Col. 8, line 8. The processing operation accesses information within local memory and changes the data within the memory location on the computer system. Col. 8, lines 4-17; Figure 1. Thus, Englefield fails to teach or suggest sending instructions to the server for execution. Therefore, both Coelho and Englefield do not teach or suggest instructing each server represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon as recited in Claims 1, 12, and 32.



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Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F.2d 781 (Fed. Cir. 1993). Coelho and Englefield, alone or in combination, fail to teach or suggest instructing each server represented by the selected graphical computing device icon to execute the instructions represented by the selected graphical action icon. For the above reasons, applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of Claims 1, 12, and 32 and assert that Claims 1, 12, and 32 are patentable under 35 U.S.C. § 103(a) over Coelho and Englefield.

c. Dependent Claims 2-11

Claims 2-11 are dependent on Claim 1. As discussed above, Coelho and Englefield fail to teach or suggest each of the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, Claims 2-11 are likewise allowable over the cited art. In addition, Claims 2-11 further add to the patentability and nonobviousness of the claims. For these reasons, applicants respectfully request withdrawal of the § 103(a) rejections of Claims 2-11 and allowance of the claims.

d. Dependent Claims 13-19

Claims 13-19 are dependent on Claim 12. As discussed above, Coelho and Englefield fail to teach or suggest each of the limitations recited in Claim 12. Accordingly, for the above-mentioned reasons, Claims 13-19 are likewise allowable over the cited art. In addition, Claims 13-19 further add to the nonobviousness of the claims. For these reasons, applicants respectfully request withdrawal of the § 103(a) rejections of Claims 13-19 and allowance of the claims.

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e. Dependent Claims 33-34

Claims 33-34 are dependent on Claim 32. As discussed above, Coelho and Englefield fail to teach or suggest each of the limitations recited in Claim 32. Accordingly, for the above-mentioned reasons, Claims 33-34 are likewise allowable over the cited art. In addition, Claims 33-34 further add to the patentability of the claims. For these reasons, applicants respectfully request withdrawal of the § 103(a) rejections of Claims 33-34 and allowance of the claims.

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III. Conclusion

Based on the above-referenced arguments, applicants respectfully submit that all of the pending claims of the present application, Claims 1-19 and 32-34, are allowable over the cited and applied references. Accordingly, applicants respectfully request withdrawal of all the rejections of the claims of the present invention and allowance of the present application. If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first-class mail with postage thereon fully prepaid and addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date: October 26, 2006

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